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13 *Counsel for Defendants*

14  
15 **UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16  
17 AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

18  
19 Plaintiffs,

20 v.

21 UNITED STATES OFFICE OF PERSONEL  
MANAGEMENT, *et al.*,

22 Defendants.  
23  
24  
25  
26  
27  
28

Case No. 3:25-cv-1780-WHA

**DECLARATION OF ROLAND EDWARDS  
IN RESPONSE TO THE COURT'S  
September 12, 2025, ORDER**

1 I, Roland Edwards, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am the Chief Human Capital Officer of the Department of Homeland Security  
3 (“Department”), headquartered in Washington, D.C. I have served in this position since 2023.

4 2. In my role at the Department, I am responsible for personnel management. I have  
5 the responsibility for overseeing the human resources enterprise and tracking and recording of  
6 personnel actions, including terminations. I assist in ensuring that all personnel actions comply  
7 with Federal law, including those related to probationary employees.

8 3. I acknowledge having received and reviewed the Court’s September 12, 2025,  
9 Order.

10 4. I confirm that, as of November 14, 2025, the Department sent corrective notices  
11 in accordance with Paragraph 5 of the Court’s September 12, 2025, Order to all applicable  
12 employees, of which there were approximately 329 individuals. An exemplar of the corrective  
13 notices is attached.

14 5. As relates to ¶ 3 of the relief contained in the September 12 Order, DHS has  
15 reviewed the electronic Official Personnel File (eOPF) of the Probationary Employees. The SF-  
16 50s for the Probationary Employees that reference their removal on February 14, 2025, have  
17 been deleted and no SF-50s in the eOPF of the Probationary Employees reference their removal  
18 on February 14, 2025.

19 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
20 and correct.

21 Dated: November 21, 2025

22  
23 **BENJAMIN R** Digitally signed by  
24 **EDWARDS** BENJAMIN R EDWARDS  
Date: 2025.11.21  
12:34:33 -05'00'

25 ROLAND EDWARDS  
26 CHIEF HUMAN CAPITAL OFFICER  
27 DEPARTMENT OF HOMELAND SECURITY  
28

*Office of the Chief Human Capital Officer*  
**U.S. Department of Homeland Security**  
Washington, DC 20528



**Homeland  
Security**

November 14, 2025

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear [REDACTED]

This corrective notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in the case *American Federation of Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.).

As required by Paragraph 5 of the district court's order, the Department of Homeland Security informs you that you were not terminated on the basis of your personal performance.

As required by Paragraph 3 of that order, the Department of Homeland Security confirms it cancelled the SF-50 terminating your employment in March 2025 and that no such SF-50 is in your personnel file.

Sincerely,

NICOLE  
C PERRY

Digitally signed by  
NICOLE C PERRY  
Date: 2025.11.14  
11:25:42 -05'00'

Nicole C. Barksdale-Perry  
Executive Director  
Human Resources Management and Services